

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

ATTORNEYS AT LAW
600 FIFTH AVENUE, 10TH FLOOR
NEW YORK, NEW YORK 10020

April 13, 2022

By ECF

Hon. Katharine H. Parker
United States Magistrate Judge
500 Pearl Street
New York, New York 10007

Re: Clark, et al. v. City of New York, No. 18 Civ. 02334 (AT) (KHP)

Dear Judge Parker:

This firm represents Plaintiffs. On behalf of both parties, we write to provide the Court a status update in advance of the April 20, 2022 conference. *See* Dkt. No. 195.

The parties continue to make progress with discovery. After the City provided Plaintiffs with remaining contact information for the class, Plaintiffs mailed class notice documents on April 11, 2022, and continue to implement the Class Notice Plan approved by the Court. *See* Dkt. Nos. 203 & 204. On April 4, Plaintiffs noticed the 30(b)(6) deposition of Defendant for May 4, 2022, and Plaintiff Turning Point for Women and Families will be deposed on May 5, 2022. Plaintiffs served the expert report of Elizabeth Bucar, Ph.D., on Defendant on March 31, 2022; Defendant's rebuttal expert report is due on May 30, 2022. *See* Dkt. No. 202. Finally, the parties are in the process of scheduling a meet and confer with respect to Defendant's Responses and Objections to Plaintiff's First Set of Requests to Admit.

The parties do not currently require the Court's assistance with any disputes.

Respectfully submitted,

/s/

O. Andrew F. Wilson

cc. All Counsel of Record (by ECF)